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RE: Public Comment Period for Operable Unit 4 (OU4) of the Anniston PCB Site

Ms. Scully and Ms. Miller,

My name is [INSERT YOUR NAME] and I am writing to voice my concerns to the Environmental Protection Agency (EPA) regarding the proposed remediation plan for OU4 of the Anniston PCB Site in Calhoun County, Alabama. This site includes Snow Creek, Choccolocco Creek, and the embayment of Logan Martin Lake on the Coosa River.

The Coosa River and its tributaries are heavily used and loved by surrounding communities and people across the state. Many people live and recreate on the water, as well as turn to waterways such as Choccolocco Creek and Logan Martin Lake for sustenance. PCB contamination must be cleaned up to the most protective standard to protect public health and our natural resources for generations to come.

The released OU4 EPA Remediation plan fails to address or adequately protect public health and natural resources in the following areas:

- **Bank Stabilization and Creek Bank Erosion:**
    - According to experts, Choccolocco Creek has many areas of poor bank stability, yet it is not clear why zones of high PCB contamination in creek banks soils are not completely or substantially removed during implementation of this remedial action.
    - We believe that PCB-contaminated sediment remains a future risk that local governments and residents will need to be aware of and manage if conditions change in the creek due to major flooding events, creek bank collapse, and changing climate

patterns. This imparts long-term monitoring and maintenance requirements, and could have adverse effects to the waterways if these measures fail or falter over time.

- The erosion protection includes creek banks having potential for minor, moderate, and severe erosion, and where PCB concentrations in these soils exceed 2.6 mg/kg. This is an improvement on the Feasibility Study, which appeared to conclude that erosion protection in 'minor' areas was not required.
- The remedial actions (sediment removal and erosion protection) proposed for Choccolocco Creek are more comprehensive than some of the options that were considered; however, we are concerned that PCB contaminated sediments will remain in the floodplain.
- The inclusion of Conservation Areas within the Choccolocco Creek corridor will assist in implementing Institutional Controls to respond to flooding and erosion, but is not a guarantee that the response will occur or be effective. It is not clear why hot spots of PCB contaminated soils below 6 inches are not removed while this remedial action is being implemented.

- **Impacts to Threatened and Endangered Species**
  - The Pygmy Sculpin (threatened), Blue Shiner (threatened), Fine-lined pocketbook (threatened), Southern pigtoe (endangered), Painted rocksnail (threatened), and Tulotoma snail (endangered) are all species that can be found in the Choccolocco Creek watershed. Sediment severely impacts the above referenced threatened and endangered species. Increased sediment in Choccolocco Creek will smother habitats, reducing the availability of suitable substrates for feeding, spawning, and shelter. It can also clog the gills of fish and mussels, leading to reduced feeding and reproduction from respiratory stress. Additionally, sediment can fill in the crevices and substrates these species use for spawning and shelter. Sedimentation will further threaten the populations of these imperiled species.
- **Institutional Controls:**
  - <u>Fish Consumption Advisories:</u>
    - The remedial actions will not immediately return the fishery to a state that fish can be safely consumed by the public. Monitored Natural Recovery and monitoring are proposed, and recovery is estimated to take two to three decades. Community engagement and education efforts will need to be intensified to prepare the public for the spike in PCB loading during the remediation process.
    - It is critical that EPA encourages the Responsible Party to partner with local groups like Coosa Riverkeeper to help disseminate information about fish

consumption advisories, impacts creek access during remediation, and field ongoing questions about the remediation process.

- The sediment remediation criteria of 2.6 mg/kg may not be protective of the invertebrates to fish to human consumption pathway. This needs to be better explained in plain language to the public stakeholders. Currently there is a DO NOT EAT ANY species fish consumption advisory on Choccolocco Creek. On Logan Martin Lake, there are multiple advisories: do not eat any striped bass, limit 1 meal per month for blue catfish, channel catfish, and spotted bass. According to Coosa Riverkeeper's creel survey data, 74% of Logan Martin Anglers, including those surveyed on Choccolocco Creek, regularly eat fish caught from the Coosa. Additionally, 31 out of 76 responses claimed that the primary fish they try to catch is catfish, which is one of the species associated with having the highest amount of PCB contaminated tissue.To compound this, 66% of those who claimed they eat fish share their catch with members of their community and family. This wider group includes people over 65, youth under 18, and women who may be pregnant or nursing. This means that there are large swaths of people eating contaminated fish tissue that are not represented by our current survey.

- <u>Public Notification during Remediation:</u>
  - During the remediation process, Coosa Riverkeeper would like to see a major increase in public notification and communication as the remediation is taking place. Examples include press releases to local papers of when and where dredging work will be performed, communication with local livery services, publicly accessible data and information at libraries, direct mail, and signs at locations where sediment removal will be taking place to alert the public.
- <u>Dam Removal: Connecting Aquatic Communities</u>
  - The scope of work proposed does not include the removal of obsolete structures, such as low head dams. Not only do these structures further impair aquatic ecology, they also pose a high risk to anyone recreating on the waterbody. Removal of any low head dam or barrier structure will improve sediment load distribution and yield higher dissolved oxygen levels. The low head dam at Jackson Shoals is an unregulated dam that if removed could reconnect an estimated 304 miles of perennial upstream waterways. Including intermittent streams, it's an estimated 676 miles connected. Although this dam is breached in one small area, fish passage will continue to be an issue with the remainder of the structure left in place. Restoring free passage for fish and invertebrates will benefit migration patterns, leading to more sustainable

population growth and a greater diversity of species. Many tributaries within the scope of OU-4 also have low head dams or barrier structures such as Coldwater Creek. The low head dam on Coldwater Creek is also unregulated and has greatly altered the natural substrate, further impacting Choccolocco Creek. The benefit to improving fish passage and aquatic connectivity cannot be overstated, and should be considered within the scope of this project.

- Highway 77 Boat Ramp
  - The Highway 77 boat ramp is the most utilized boat ramp on Choccolocco Creek and is particularly used by subsistence anglers. During the PCB remediation process, our organization would like to see major improvements to this public access point as a way to increase safe access to Choccolocco Creek. Improvements would include the repaving of the parking lot, better road signage, widening and repaving of the boat ramp, replacing the existing wooden docks, and a dumpster available on site. According to our Creel Survey, the majority of Logan Martin anglers believe that signage is the best method to disseminate Fish Consumption Advisory Information.

- **Monitored Natural Recovery is Vague**
  - The monitoring of natural recovery was not specifically detailed in the Feasibility Study, although there were implications that monitoring and assessment would continue. The proposed Monitored Natural Recovery (MNR) program is vague. The MNR program should be developed in detail to identify what specific sampling and analyses will be completed, how frequent and intense that sampling will be, and what criteria will be used to determine success or failure. Leaving the site with areas to "wait and see" is not protective of human health. More detail needs to be provided to the public for ongoing monitoring efforts and if issues are detected, how they will be addressed.
- **Downstream impacts on Logan Martin Lake:**
  - Choccolocco Creek is currently listed on the ADEM 303(d) List of Impaired Waters. There are a total of 10 impairments along the span of Choccolocco Creek ranging from Pathogens (E. coli), Priority Organics (PCBs), and Metals (Mercury). For the PCB impairments on Choccolocco Creek, all have been designated for the development of a Total Maximum Daily Load (TMDL); however, there has been no update on the status of the creation and implementation of the TMDL from ADEM or how it may play into the remediation process.
  - Sediment loading is a leading pollutant in Alabama. Due to higher amounts of land development, natural erosion, and extreme weather events, large concentrations of sediment can enter our waterways and further degrade water quality. Some pollutants can also thrive in sediment such as E. coli and PCBs. The PCB-contaminated sediment is

the focus for the EPA's proposed remediation plan, and there should be considerable focus placed on the implementation of Best Management Practices (BMPs) to mitigate unsafe levels of PCBs or pathogens downstream of the Snow Creek/Choccolocco Creek confluence.

- A large proportion of the PCB-contaminated soils/sediments will remain in place, which presents future risks as aquatic and terrestrial conditions change due to flooding, extreme weather patterns, and land development. Our organization would like to see more PCB-contaminated material removed entirely from OU4 to a permitted landfill away from a public waterway.
- Logan Martin Lake should be evaluated for PCB remediation. It is the water body that has and will continue to receive the PCB contaminated sediments that flow down Choccolocco Creek during the remediation process. Much of Logan Martin Lake and several other tributaries are impaired for PCB contamination, but there has been little to no discussion on remediating PCBs from the reservoir.

- **Newer Data is Needed:**
  - No significant new data was presented with the Superfund Proposed Plan, although additional investigation is proposed in support of remedial actions associated with creek bank stabilization. Some of the data sets used to inform the Proposed Plan are from the late 1990s through the mid-2010s. This data is insufficient and our organization looks forward to the EPA having access to more relevant data during the Remedial Design phase.
  - Specific data should be considered that takes into account climate change, any proposed or future development plans along Choccolocco Creek, and hydrologic modeling.

Thank you for the opportunity to provide comments on this proposed plan. I advocate for OU4's soil, sediment, water, wildlife, and communities to be cleaned up and protected to the most protective measure.

Sincerely,
[INSERT DIGITAL SIGNATURE]